

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	Hearing Date: July 29, 2014 at 10:00 a.m. Objections Due: July 22, 2014
Caption in Compliance with D.N.J. LBR 9004-2(c) HODGSON RUSS LLP 1540 Broadway, 24 th Floor New York, New York 10036 (212) 751-4300 Heidi J. Sorvino, Esq. <i>Attorneys for Heddle Marine Service, Inc.</i>	
In Re: DGI SERVICES, LLC, Debtor.	Chapter 7 Case No. 11-46042 Hon. Gloria M. Burns
Linda L. McMackin, Trustee, Plaintiff, v. Heddle Marine Service, Inc., Dean Topolinski, ABC Corporation 1-3, and John Doe 1-3, Defendant	Adversary Case No. 14-1050

**NOTICE OF HEARING ON MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that a hearing will be held before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Courtroom 4C, Camden, N.J. 08101, on **Tuesday, July 29, 2014 at 10:00 a.m.** upon the motion (the “Motion”) of Heddle Marine Service, Inc. (“Heddle”), by and through its counsel, Hodgson Russ LLP (“Hodgson Russ”), pursuant to Federal Rule of Civil Procedure 12(b)(2), as incorporated by Federal Rule of Bankruptcy Procedure 7012,

seeking an Order of this Court (1) authorizing the dismissal of the adversary complaint against Heddle due to lack of personal jurisdiction; and (2) granting such other and further relief as it may deem just and proper; and

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested, must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and shall be filed with the Bankruptcy Court, no later than **July 22, 2014**, and personally served upon and received by counsel to the Defendant, Heidi J. Sorvino, Esq., Hodgson Russ LLP, 1540 Broadway, 24th Floor, New York, NY 10036.

PLEASE TAKE FURTHER NOTICE that, in the event that timely objections are not filed with the Court and served upon the undersigned counsel as provided in D.N.J. L.B.R. 9013-1(a) and (f), the relief requested shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the Memorandum of Law and the Affidavit filed in support of the Motion, both of which are annexed hereto, the record of the proceedings, oral argument and testimony, if required.

PLEASE TAKE FURTHER NOTICE, that the undersigned requests oral argument.

A proposed form of Order accompanies this Motion.

Dated: New York, New York
June 17, 2014

HODGSON RUSS LLP
Counsel to Heddle Marine Service, Inc.

By: /s/ Heidi J. Sorvino
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